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EPA Region 5 Records Ctr.
279362

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

FEB 01 1990

Christopher P. Davis
Goodwin, Proctor and Hoar
Counselors at Law
Exchange Place
Boston, Massachusetts 02109-2881

Charleyne Gabriel
Office of Legal Counsel
Indiana Department of Environmental Management
105 South Meridian Street
P.O. Box 6015
Indianapolis, IN 46206-6015

Re: Gemeinhardt Consent Order

Dear Counselors:

Please find enclosed a copy of the consent order, duly executed by all parties, resolving matters pertaining to ground water removal activities at and near the site of the Gemeinhardt facility in Elkhart, Indiana. As you will note, it has an effective date of January 23, 1990.

Thank you for your efforts in bringing this matter to a consensual resolution.

Sincerely,


Charles McKinley
Assistant Regional Counsel

Enclosure

cc: Ken Theissen
Robert Bowden

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:

GEMEINHARDT SITE
ELKHART, INDIANA

RESPONDENT:

GEMEINHARDT, FORMERLY A
UNIT OF CBS, INC.

DOCKET NO. V-W-85-C-003

ADMINISTRATIVE ORDER BY
CONSENT PURSUANT TO
42 U.S.C. Sections
9606(a) and 9622(h)

ADMINISTRATIVE ORDER PREAMBLE

This Administrative Order ("Order") is issued to Gemeinhardt, formerly a unit of CBS Inc., ("Respondent"), pursuant to the authority vested in the President of the United States by Sections 106(a) and Section 122(h) of the Comprehensive Environmental, Response, Compensation, Liability Act of 1980, 42 U.S.C. Section 9606(a) and 9622(h), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499, and delegated to the Administrator of the United States Environmental Protection Agency ("U.S. EPA") by Executive Order No. 12580, January 23, 1987, 52 Fed. Reg. 2923, and further delegated to the Assistant Administrator by U.S. EPA delegation numbers 14-14, 14-14-A, 14-14-C and 14-14-D and to the Director, Waste Management Division, Region V, by Regional delegations 14-14-C and 14-14-D. This Order is issued by the U.S. EPA and by the Indiana Department of Environmental Management ("IDEM") and requires the Respondent to undertake and complete certain response actions, including removal and treatment of

groundwater, to prevent the migration of hazardous substances in groundwater and to prevent exposure to groundwater containing hazardous substances.

FINDINGS OF FACT

1. The Gemeinhardt facility (the "Gemeinhardt Site") is located on Route 19 in Elkhart, Indiana, and is occupied in part by Gemeinhardt Plant No. 1.

2. For a number of years, Gemeinhardt has used Plant No. 1 to manufacture musical instruments. In the process of manufacturing these instruments, Gemeinhardt used the chemicals 1,1,1-trichloroethane (1,1,1-TCA), trichloroethene (TCE), and tetrachloroethene (PCE), which are chlorinated volatile organic compounds (VOCs).

3. At various times prior to 1984, Gemeinhardt discharged into dry wells and a seepage bed wastewater containing 1,1,1-TCA, TCE and PCE.

4. Pursuant to EPA Administrative Consent Order No. V-W-85-C-003, dated March 7, 1985 (the "1985 Order") and the 1987 IDEM Consent Decree (Cause No. B-935), Gemeinhardt performed a comprehensive hydrogeological study and submitted to EPA Region V on October 14, 1988 a Final Report of the Hydrogeological Investigation and Hazard Evaluation, Gemeinhardt Site Area, Elkhart, Indiana ("Hydrogeological Report"), prepared by ENSR Consulting and Engineering (formerly ERT) of Acton, Massachusetts, on behalf of Gemeinhardt.

5. The Hydrogeological Report found 1,1,1-TCA, TCE, and PCE in the groundwater at, and downgradient of, the Gemeinhardt plant and a plume containing these VOCs extending north-northwest from the Gemeinhardt plant. The Hydrogeological Report also found evidence of at least one other source of these VOCs unrelated to the Gemeinhardt facility.

6. In response to this groundwater contamination, the EPA and Gemeinhardt undertook a total of three alternate water supply projects for all residences and commercial establishments believed to be potentially affected by this contamination. In late 1984, EPA provided bottled water and offered hookups to city drinking water to residences on Hawthorne and Krieghbaum Avenues. Gemeinhardt reimbursed EPA for the cost of this alternative water supply project in the amount then demanded by EPA. In 1986, Gemeinhardt extended city water mains into the Fieldhouse and Markle Avenues neighborhood and provided free hookups to the residences in this area. In 1988, Gemeinhardt extended water mains and provided free hookups to public water mains for other potentially affected residences and businesses not previously connected.

7. As a result of the alternate water supply projects, no occupants of the residences or businesses in the vicinity of the Gemeinhardt Site are believed to be drinking or being exposed to groundwater containing 1,1,1-TCA, TCE or PCE.

8. If no measures are taken to prevent the spread of the plumes of VOCs downgradient of the Gemeinhardt plant, these plumes may continue to migrate in a north-northwest direction, could enter and affect currently uncontaminated areas, and could eventually discharge into the St. Joseph River.

9. In December, 1988, pursuant to the 1985 Order, Gemeinhardt submitted to EPA Region V and to IDEM a report prepared by ENSR entitled Remedial Action Evaluation and Recommendation, Gemeinhardt Site Area, Elkhart, Indiana (the "Remedial Action Report") evaluating potential remedial action alternatives and proposing a Recommended Remedial Action (the "Recommended Action") to address the off-site groundwater contamination downgradient of the Gemeinhardt plant. The Remedial Action Report included a conceptual design of the Recommended Action.

10. The Recommended Action consists of installing three recovery wells and a treatment facility to remove and treat contaminated groundwater containing chlorinated VOCs. The treated groundwater would then be lawfully discharged either to a nearby sanitary sewer line and/or by groundwater recharge. The Recommended Action is intended to prevent further migration of the VOCs in the groundwater and to remove those VOCs present in the groundwater.

11. The Recommended Action is a necessary and appropriate response action pursuant to CERCLA Section 106(a), and is consistent with the National Contingency Plan.

DETERMINATIONS

1. The Gemeinhardt Site is a "facility" as defined by Section 101(9) of CERCLA, 42 U.S.C. Section 9601(9).

2. 1,1,1-trichloroethane, trichloroethene and tetrachloroethane are "hazardous substances" as defined by Section 101(14), 42 U.S.C. Section 9601(14).

3. Gemeinhardt is a "person" as defined by Section 101(21) of CERCLA, 42 U.S.C. Section 9601(21).

4. Gemeinhardt is an "owner" and an "operator" of the Gemeinhardt facility as defined by Section 101(20) of CERCLA, 42 U.S.C. Section 9601(20). Gemeinhardt is therefore potentially liable under Section 107(a) of CERCLA, 42 U.S.C. Section 9607.

5. The discharges of wastewater containing 1,1,1-trichloroethane, trichloroethene, and tetrachloroethene into the groundwater at the Gemeinhardt Site were "releases" as defined by Section 101(22) of CERCLA, 42 U.S.C. Section 9601(22).

6. A number of businesses and residences in the area downgradient of the Gemeinhardt Site utilize groundwater obtained from private wells. If the migration of hazardous substances downgradient of the Site is not contained and the contaminants removed from the groundwater, the uncontrolled migration of hazardous substances in the groundwater may pose an imminent and substantial endangerment to the public health or welfare or the environment in presently unaffected areas.

7. In order to protect human health and welfare and the environment from future risk, and to prevent the further migration of hazardous substances, it is necessary that action be taken to remove and treat groundwater containing VOCs in the vicinity of the Gemeinhardt Site.

8. The Recommended Action, if implemented in accordance with this Order, is a removal action consistent with the National Contingency Plan, 40 CFR Part 300, as amended, and is consistent with long-term remediation of the Facility.

ORDER

Based upon the foregoing findings and determinations and pursuant to Sections 106(a) and 122(h) of CERCLA, 42 U.S.C. Sections 9606(a) and 9622(h), and the Respondent having agreed to be bound by the following terms and conditions, it is hereby ordered that Respondent undertake the following actions:

1. Upon the effective date of this Order, Respondent shall promptly and diligently use its best efforts to obtain access to areas which are not under its ownership or control that are necessary for the performance of the Recommended Action. If, despite its best efforts, Respondent has not obtained access to all such areas as of February 15, 1990, it shall so notify EPA and IDEM and shall submit a report as to its efforts and possible alternative approaches.

2. Respondent shall, within 90 days of obtaining necessary access, submit for EPA and IDEM review and EPA approval design documents consisting of plans and specifications for the

construction of the Recommended Action and including a schedule for implementation (the "Design Documents"). U.S. EPA, after consultation with IDEM, may approve, disapprove, require revisions of, or modify the Design Documents. Respondent shall implement the Recommended Action as finally approved by U.S. EPA (the "Work"). Once approved, the Design Documents shall be deemed to be incorporated into and made a fully enforceable part of this Order.

3. The Design Documents shall contain a site safety and health plan and a sampling and analysis plan to monitor groundwater quality and treatment performance. The site safety and health plan shall be prepared in accordance with the Occupational Safety and Health Administration (OSHA) regulations applicable to Hazardous Waste Operations and Emergency Response, 29 CFR Part 1910. The Design Documents and other submitted documents shall demonstrate that the Respondent can properly conduct the actions required by this Order.

4. Respondent shall retain a qualified engineer to prepare the Design Documents and a qualified contractor(s) to perform the Work, and shall notify U.S. EPA and IDEM of the name of such engineer within 60 days of the effective date of this order and the name(s) of the contractor(s) prior to the commencement of the Work. U.S. EPA retains the right to disapprove of any, or all, of the contractors and/or subcontractors retained by the Respondent. In the event U.S. EPA disapproves of a selected contractor, Respondent shall retain a different contractor to

perform the Work, and such selection shall be made within thirty (30) business days following U.S. EPA's disapproval.

5. Within 60 calendar days after U.S. EPA approval of the Design Documents, or upon U.S. EPA's approval of Respondent's construction contractor(s), whichever occurs last, Respondent shall commence implementation of the Work. Failure of the Respondent to implement all aspects of the Work shall be deemed to be a violation of the terms of this Order.

6. The Respondent shall provide written progress reports to U.S. EPA and IDEM according to the schedule contained in the Design Documents approved by U.S. EPA. At a minimum, these written progress reports shall include the following:

a. A concise description of action taken toward achieving compliance with this Consent Order;

b. The results of any sampling and testing and any other raw data produced since the submission of the previous progress report which relates to the facility;

c. Target dates for completing any remaining activities required by this Order and an explanation of any deviations from the schedules in the Design Documents.

7. Following the construction of the groundwater removal, treatment and discharge system, Respondent shall continuously operate and maintain such system for at least three (3) calendar years.

8. Within 60 days of the completion of each year of operation of the system, Respondent shall submit a written report to U.S. EPA and IDEM prepared by a qualified consultant summarizing the results of the prior year's operation (including groundwater monitoring results) and the impact upon groundwater conditions of the Removal Action.

9. Following the third year of operation, or at anytime prior or subsequent thereto as may be agreed by the parties, U.S. EPA, IDEM, and Respondent shall confer in good faith and attempt to reach agreement on the need for, and duration of, any further groundwater removal and treatment pursuant to this Order.

10. All materials containing hazardous substances or hazardous constituents removed from the Site pursuant to this Order shall be disposed of, or treated at, a facility approved by the On-Scene Coordinator and in accordance with the Resource Conservation and Recovery Act of 1976 (RCRA), 42 U.S.C. Section 9601, et seq., as amended; the U.S. EPA Revised Off-Site Policy, and/or all other applicable Federal, State, and local requirements.

11. Within 15 days of the effective date of this Order, the Respondent shall designate a Project Coordinator. To the extent feasible, the Project Coordinator shall be present on site or readily available during site work. The U.S. EPA has designated Kenneth Theisen of the Emergency and Enforcement Response Branch, Section II, as its On-Scene Coordinator. IDEM has designated Debra Chelf as its project coordinator. The On-Scene

Coordinator and the Project Coordinators shall be responsible for overseeing the implementation of this Order. To the maximum extent possible, communication between the Respondent, IDEM, and the U.S. EPA, and all documents, reports and approvals, and all other correspondence concerning the activities relevant to this Order, shall be directed through the On-Scene Coordinator and the Project Coordinators.

12. The U.S. EPA, IDEM, and the Respondent shall each have the right to change their respective designated On-Scene Coordinator or Project Coordinators. Each party shall notify the other parties as early as possible before such a change is made, but in no case less than 24 hours before a change. Notification may initially be verbal, but shall promptly be reduced to writing.

13. The U.S. EPA On-Scene Coordinator shall have the authority vested in an On-Scene Coordinator by the National Contingency Plan ("NCP"), 40 CFR Part 300, as amended, including the authority to halt, conduct, or direct any work required by this Order, or to direct any other response action undertaken by U.S. EPA or the Respondent at the Facility. All instructions by the U.S. EPA On-Scene Coordinator or his designated alternate shall be binding upon the Respondent as long as those instructions are not clearly inconsistent with the National Contingency Plan.

14. The provisions of this Order and the directions of the On-Scene Coordinator shall be binding on the employees, agents, successors, and assigns of the Respondent, so long as those instructions are not inconsistent with the NCP.

15. To the extent that areas where work under this Order is to be performed are owned by or are in the possession of, someone other than the Respondent, Respondent shall obtain all necessary access agreements or easements. In the event that after using its best efforts Respondent is unable to obtain such agreements, Respondent shall immediately notify U.S. EPA and IDEM and U.S. EPA and IDEM may then assist Respondent in gaining access, to the extent of its authority.

16. Respondent shall provide access to areas where work is conducted pursuant to this Order to U.S. EPA and IDEM employees, contractors, agents, and consultants at reasonable times, and shall permit such persons to be present and move freely in the area in order to conduct inspections, including taking photographs and videotapes of such areas, to do cleanup/stabilization work, to take samples to monitor the work under this Order, and to conduct other activities which the U.S. EPA or IDEM determine to be necessary.

17. Copies of all records and files within Respondent's possession, custody or control relating to hazardous substances found on the site shall be retained by Respondent for six years from the effective date of this Order and all which are not privileged shall be made available to the U.S. EPA and IDEM prior

to the termination of the removal activities under this Order.

18. All notices, reports and requests for extensions submitted under terms of this Order shall be sent by certified mail, return receipt requested, and addressed to the following:

one copy	Kenneth Theisen On-Scene Coordinator U.S.EPA, Region V (5HS-11) 230 S. Dearborn Street Chicago, IL 60604
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one copy	Charles Mckinley Assistant Regional Counsel U.S. EPA (5CS-TUB-4) 230 S. Dearborn Street Chicago, IL 60604
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one copy	Debra Chelf Project Coordinator 5500 W. Bradbury Avenue Indianapolis, IN 46241
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19. If any provision of this Order is deemed invalid or unenforceable, the balance of this Order shall remain in full force and effect. No extensions to the time periods required herein shall be granted without sufficient cause. All extensions must be requested, in writing, and shall not be deemed accepted unless approved, in writing, by U.S. EPA.

20. The Respondent shall cause all work to be performed within the time limits set forth herein and in the approved Design Documents, unless performance is delayed by events which constitute a force majeure. For purposes of this Consent Order, a "force majeure" is an event beyond the control of the

Respondent which delays or prevent the performances of any obligation under the terms of this Consent Order. Increases in costs shall not be considered circumstances beyond the control of the Respondent. The Respondent shall notify U.S. EPA and IDEN in writing no later than five (5) calendar days after the beginning of a delay caused by an event which the Respondent contends is a force majeure. Such notification shall describe the anticipated length of the delay, the cause or causes of the delay, the measures taken and to be taken by the Respondent to minimize the delay, and the timetable by which these measures will be implemented. The Respondent shall have the burden of demonstrating that the event is a force majeure. If U.S. EPA, after consultation with IDEN, agrees that a delay is attributable to a force majeure, the time period for performance under this Consent Order shall be extended for the time period attributable to the event constituting the force majeure.

21. The parties shall use their best efforts to, in good faith, resolve all disputes or differences of opinion informally. If, however, disputes arise concerning this Consent Order which the parties are unable to resolve informally, the Respondent or IDEN shall present a written notice of such dispute to U.S. EPA and the other party, which shall set forth specific points of dispute, the position of the Respondent or IDEN, the technical facts relating to the dispute, and any actions which the Respondent or IDEN considers necessary. Within fifteen (15) calendar days of receipt of such a written notice, U.S. EPA

shall provide a written response to the Respondent and IDEM setting forth U.S. EPA's position and the basis for it. The other party may, within the same time frame, set forth its position in writing.

After considering the positions of the parties, U.S. EPA shall resolve the dispute. If U.S. EPA concurs with the position of the Respondent or IDEM the Respondent and IDEM shall be so notified in writing and the Consent Order shall be modified to include any necessary extensions of time or variance of Work. If U.S. EPA does not concur with the position of the Respondent or IDEM, U.S. EPA shall resolve the dispute based upon and consistent with the terms of this Consent Order and applicable law and shall provide written notification of such resolution to the respondent and IDEM. Respondent and IDEM shall have the right to petition the Court for a review of EPA's final determination. In any such judicial proceedings, the petitioner shall have the burden of demonstrating, based on the administrative record, that the position of EPA is arbitrary and capricious or otherwise not in accordance with law or this Order.

The pendency of dispute resolution, including any judicial proceedings, shall not affect the time periods for completion of work and/or obligations to be performed under this Consent Order, except upon agreement of the U.S. EPA, IDEM, and Respondent. However, a time period may be extended not to exceed the actual time taken to resolve the dispute unless otherwise agreed by the parties. Elements of work and/or obligations not affected by the

dispute shall be completed in accordance with the schedule contained in the Design Documents.

Upon resolution of any dispute, whether informally or by using the procedures in this Section, any addition, or modifications required as a result of such dispute resolution shall immediately be incorporated, if necessary, into the appropriate plan or procedure and into this Consent Order. The Respondent shall proceed with all remaining Work according to the modified plan or procedure.

22. Subject to the provisions of this Consent Order, for each day the Respondent fails to submit reports or to perform or complete implementation of removal actions required under this Consent Order, in accordance with the schedule contained in the Design Documents, it shall, upon demand by U.S. EPA, pay a stipulated penalty in the amount as follows:

a. For failure to submit the Design Documents, to commence construction of the groundwater removal, treatment, and discharge system, or to complete said construction as specified in the Design Documents: One Thousand Dollars (\$1,000) per day for one (1) to seven (7) business days of delay, and One Thousand Five Hundred Dollars (\$1,500) per day for each day of delay, or part thereof, thereafter;

b. For failure to timely submit any reports or perform any other activity for which a deadline is specified pursuant to this Consent Order or the Design

Documents: Two Hundred Fifty Dollars (\$250) per day for the first one (1) to seven (7) business days of delay, and Five Hundred Dollars (\$500) per day for each day of delay, or part thereof, thereafter.

All penalties which accrue pursuant to the requirements of this Section shall be paid by certified or cashier's check to the "Hazardous Substance Superfund" with a notation "Gemeinhardt #N9, and shall be remitted to:

EPA - Region 5
Attn: Superfund Accounting
P.O. Box 70753
Chicago, IL 60673

Copies of any such checks shall be provided to U.S. EPA, Region V, Waste Management Division (5HS-11) 230 South Dearborn, Chicago, Illinois 60604.

23. Nothing contained in this Order shall be construed to prevent U.S. EPA or IDEM from seeking legal or equitable relief to enforce its terms, or prevent U.S. EPA or IDEM from taking other legal or equitable actions as authorized by CERCLA or any other statute or from requiring the Respondent in the future to perform additional activities pursuant to CERCLA, 42 U.S.C. Section 9601, et seq., or any other applicable law except as provided in paragraph 24 below.

24. Except as otherwise provided herein, from the date of this Consent Order, for as long as the terms herein are complied with, and upon or after termination of this Consent Order pursuant to paragraph 31, below and reimbursement to U.S. EPA and

IDEM of amounts due as stipulated penalties and oversight costs under this Consent Order, U.S. EPA and IDEM covenant not to sue or to take administrative action against Respondent, its divisions, parents, predecessors, successors, or assigns, regarding matters within the scope of this Order, except with respect to conditions at the Facility currently unknown to EPA or IDEM or if information is received by EPA or IDEM which indicate that the Work is not protective of human health or the environment.

25. Respondent shall reimburse the Hazardous Substance Superfund in the amount of \$35,000, in full satisfaction of the unreimbursed portion of EPA's past removal costs. Payment is to be made by certified or cashier's check payable to "Hazardous Substance Superfund" with a notation, "Gemeinhardt #N9" and forwarded to the address set forth in Section 21, above. A copy of said check shall be sent to U.S. EPA, Region V, Waste Management Division (SHS-11), 230 South Dearborn, Chicago, Illinois 60604.

26. Respondent shall pay all future oversight costs of the United States and the State of Indiana related to performance of the Recommended Action by Respondent, which are not inconsistent with the National Contingency Plan, not to exceed \$20,000 per year to the United States and \$10,000 per year to the State of Indiana. Costs incurred by the United States and the State of Indiana in seeking to enforce this Order or in taking action under paragraphs 23 or 24, above, shall not be subject to the .

dollar limits in the preceeding sentence. The United States and the State of Indiana shall submit an itemized cost statement and supporting documentation to Respondent. Payment shall be made within 60 days of Respondent receipt of the statement and documentation. Payments shall be made to the EPA Hazardous Substances Superfund delivered to the U.S. EPA, Attn: Superfund Accounting, P.O. Box 70753, Chicago, Illinois 60673, in form of a certified or cashier's check payable to "EPA Hazardous Substances Superfund", with a notation "Gemeinhardt Site, #N9" and to the "Hazardous Substances Response Trust Fund", delivered to IDEM, Attention: Cashier, 105 South Meridian Street, Indianapolis, Indiana, in the form of a cashiers or certified check or wire transfer.

27. The Respondent shall indemnify and save and hold harmless the United States and the State of Indiana, their agencies, departments, agents, and employees, from any and all claims or causes of action arising from, or on account of, acts or omissions of the Respondent, its officers, employees, receivers, trustees, agents, or assigns, in carrying out the activities pursuant to this Order.

28. U.S. EPA, Region V, has determined that the total response costs, incurred by the United States as of the effective date of this Order at or in connection with the Site do not exceed \$500,000, excluding interest, and that, based upon information currently available to U.S. EPA, total response costs to be incurred by the United States at or in connection with the Site

are not anticipated to exceed \$500,000, excluding interest.

29. Except as to paragraph 25, this Consent Order shall be effective ten (10) calendar days after it is signed by U.S. EPA. Paragraph 25 shall be effective only after the requirements of Section 122(i) of CERCLA have been complied with and U.S. EPA has so notified Respondent, in writing. If U.S. EPA determines that the terms of paragraph 25 are inappropriate, improper, or inadequate, paragraph 25 shall be of no effect.

30. This Consent Order may be amended by mutual agreement of the Parties. Any such amendment shall be in writing, signed by U.S. EPA, IDEN, and the Respondent, and shall have as the effective date that date on which such amendment is signed by U.S. EPA.

31. The provisions of this Consent Order shall be deemed satisfied upon receipt by the Respondent of written notice from U.S. EPA, after it has consulted with IDEN, that the respondent has demonstrated that all of the terms of this Consent Order have been completed to the satisfaction of U.S. EPA. Upon such demonstration by the Respondent, such written notice shall not unreasonably be withheld or delayed.

IT IS SO AGREED:

Dated: Jan 12, 1990

CBS Inc., on behalf of
GEMEINHARDT

BY: [Signature]

ITS: Senior Vice President - General
Counsel and Secretary

IT IS SO AGREED AND ORDERED:

United States Environmental Protection Agency

BY: [Signature]

Basil G. Constantelos, Director
Waste Management Division,
Region V

Dated: 1-23-90

Indiana Department of Environmental Management

BY: [Signature]

Kathy Prosser
Commissioner

Dated: 1-17-90

P 837 650 52A

RECEIPT FOR CERTIFIED MAIL

NO REQUEST FOR RETURNED MAIL
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Christopher P. Davis
Goodwin, Proctor and Hoar
Exchange Place
Boston, MA 02109-2881

Postage	103
Certified Fee	25
Special Delivery Fee	
Registered Delivery Fee	
Return Receipt showing to whom and Date Delivered	90
Return Receipt Date and Address	
TOTAL Dues	128
Postmark or Date	

PS Form 3800, June 1985

Christopher P. Davis
Goodwin, Proctor and Hoar
Exchange Place
Boston, MA 02109-2881